

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA

v.

DOROTHY J. SPALDING

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Case No. 2:06-cr-0084-VPM

REQUEST FOR QUESTIONS TO PROSPECTIVE JURORS
ON VOIR DIRE EXAMINATION

COMES NOW Dorothy J. Spalding, the Defendant herein, by and through her undersigned counsel, and respectfully requests this Honorable Court to ask the following questions of the prospective jurors on *voir dire* examination and obtain information sought by such questions. The Court is requested to pursue more detailed questioning if a particular juror's answer reveals that further inquiry is appropriate. This request is made in order that the Defendant and her attorney may consider the information obtained when making challenges for cause and peremptory strikes in the selection of the jury to serve in this case.

1. Are you related by blood or marriage, or have you worked with, or are you personally acquainted with, any of the persons you have seen here in Court today or whose names you have heard in Court today?
2. Has any member of your family, friend, or acquaintance ever worked in any type of law enforcement related job?
3. Do you think a law enforcement official has more credibility than a person who is not in law enforcement?
4. Would you give greater credence to the testimony of a law enforcement officer merely because he is such an officer?
5. Do any of you believe that the defendant is probably guilty or he would not be here today?
6. Have any of you ever sworn out a warrant or otherwise brought criminal charges against another person?
7. Has any member of your family, friend, or acquaintance ever served in the military?

8. Is there any other matter that may have some bearing on your ability to serve as a juror on this case?
9. Do you know of any reason that may prevent you from doing your sworn duty to render an impartial verdict based solely upon the evidence presented in this trial and the law as you receive it in the Court's instruction?
10. Have you ever served on a jury in a case involving theft of property? If so:
 - a. When?
 - b. Where?
 - c. What was the verdict?
11. Have you ever been accused of something you did not do?
12. Do any of you believe that a Defendant must tell his or her side of the story to the jury?
13. Dorothy Spalding has already plead not guilty to the charges. How many of you feel you need to hear her side of the story before you make a decision?
14. Would any of you tend to give any greater weight or credibility, no matter how slight, to the testimony of a federal agent or prosecution witness merely because they are employees of, or are testifying on behalf of, the government?
15. Would you give their testimony greater weight or credibility over that of the defendants or witnesses on the defendant's behalf?
16. Have you ever been the victim of a crime involving theft? If so, please state:
 - a. When?
 - b. Where?
 - c. Would those events make it difficult for you to be fair and impartial as a judge of the facts in this case?

Respectfully submitted this 10th day of July, 2006.

s/John M. Poti
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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Kent Brunson, Neal Frazier, and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants: none.

s/John M. Poti
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